

United States District Court
for the District of Massachusetts

United States of America

V.

Kathryn Zepka (sic), *et als*

Defendant

Crim. No. 04-30046-MAP

Defendant's Motion to Amend Conditions of Pretrial Release

NOW COMES the Defendant, Kathryn Zepka (*sic* Catherine Zepka), by counsel in the above-captioned action and moves that this Honorable Court orders the amendment of her conditions of pretrial release.


AS GROUNDS HEREFOR the Defendant states that said conditions require her to “maintain employment.” As a result of the instant charges, Defendant Zepka has been terminated from her employment. She is actively seeking new employment and, therefore, requests amendment from “maintain[ing] employment” to an order that she continue to seek employment. The Defendant will continue to inform her Pretrial Services Officer of her activity seeking employment.

Date: November 28, 2005

Respectfully Submitted,
The Defendant,

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CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury that a copy of this Motion was served upon the USA by mailing to AUSA William Welch, U.S. Attorney's Office, 1550 Main St., Springfield, MA 01103 and to U.S. Probation Pre-trial Services Officer Irma Zingarelli at 1550 Main Street, Springfield, MA 01103 on this 29 day of November, 2005. 

[Signature]